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LETTER REGARDING U S AIR FORCE RESPONSES TO SUBSURFACE CONTAMINATION
AT BASE SERVICE STATION NAS FORT WORTH TX
9/28/1995
CARSWELL AIR FORCE BASE

263000



**NAVAL AIR STATION
FORT WORTH JRB
CARSWELL FIELD
TEXAS**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 268



DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

File: 17A-57
A.F.

268
268001

28 Sep 95

MEMORANDUM FOR TNRCC


Attn: Mr. Geoffrey Meyer
P. O. Box 13087
Austin, Texas 78711-3087

FROM: AFBCA/OL-H
6550 White Settlement Road
Fort Worth, TX 76114-3520

Certified Mail
Return Receipt Requested

SUBJECT: Response to 10 Jul 95 TNRCC letter on "Subsurface Contamination at the Base Service Station (BSS)"

Attached are AFBCA comments to your 10 Jul 95 letter with appropriate attachments required to meet the 10 October 1995 deadline.


OLEN R. LONG, GM-13
Installation Management Officer

Attachments:
AFBCA Remarks
Copy of TNRCC Ltr, dtd 10 Jul 95
DD Form 1391- Project Summary of BSS

cc:
AFBCA/SW - Mr. Ray Hatch
TNRCC - Mr. Ray Newby

Response to the 10 Jul 95 TNRCC letter on "Subsurface Contamination at the Base Service Station Building 1518, Carswell Air Force Base (AFB), Fort Worth (Tarrant County), Texas (LPST ID No. 104524 - Priority 1.5)

Paragraph I

The Texas Natural Resource Conservation Commission (TNRCC) has carefully reviewed the Existing LPST Case Questionnaire for the above referenced facility submitted August 30, 1994 and prepared by the U.S. Army Corps of Engineers, Ft. Worth District. The questionnaire indicates that this site is considered as a priority 1.5 due to the threat it may pose to the West Fork of the Trinity River. A letter dated August 11, 1994, from Mr. Frank Grey of Carswell AFBCA to Ms. Liz Scaggs of TNRCC PST, indicated that an interim remediation system would be installed on the subject site in late fiscal year (FY) 1994 and a ground water monitoring program would be implemented with comprehensive site assessment activities in FY 1995. Based upon the information provided to this office at this time and recent communications with Mr. Frank Grey of AFBCA, the proposed corrective action activities have yet to be implemented. Please understand that the TNRCC considers the subject site as a high priority case due to the historical release of petroleum hydrocarbons to the West Fork of the Trinity River.

Response: Project 94-7206, RD/RA Base Service Station, is funded for Fiscal Year (FY) 96. This project is a three (3) year project to perform remedial investigations and a risk assessment in FY96, a remedial design and remedial action in FY97, and continuing through project 94-7011, Base Wide Well Monitoring at Carswell AFB (reference contact number F41624-94-D-8050/0001, with Law Environmental). Sampling occurs quarterly and is reported semi-annually. The first semi-annual report is due the first week of October. Upon receipt and acceptance of this contractual deliverable, a copy will be provided to the TNRCC point of contact(s) (POCs). Reviews by AFCEE technical staff (Attachment 1 and 2) recommend not to perform interim remediation until after further remedial investigation reveals the extent of the contamination and a risk assessment is performed (scheduled and funded for FY96). Remedial design and remedial action will occur (FY97/98).

Paragraph II

The TNRCC is responsible for protecting waters of the state as well as public health and safety from contamination that may result when a release occurs from a storage tank system. Title 30, Texas Administrative Code (TAC), Section 334.71-334.85 requires the owner or operator of a storage tank system to immediately abate any release of a regulated substance and to conduct an investigation for soil and groundwater cleanup. A ground water monitoring program using the guidelines in the enclosed pamphlet titled *Groundwater Monitoring and Reporting* and interim remediation should be implemented immediately. An interim remediation plan must be submitted to this office no later than 60 days from the date of this letter and the first ground water monitoring report must be submitted no later than 90 days from the date of this letter.

Response: A ground water monitoring program is already in place through project 94-7011, Base Wide Well Monitoring at Carswell AFB (reference contact number F41624-94-D-8050/0001, with LAW Environmental). Sampling occurs quarterly and is reported semi-annually. The first semi-annual report is due the October 16, 1995. Upon receipt and acceptance of this contractual deliverable, a copy will be provided to the TNRCC point of contact(s) (POCs).

Remedial design and remedial action will occur (FY97/98). See Attachment 3 for interim remediation plan. Additional documentation will be provided as it becomes available. The Statement of Work (SOW) for the FY96 phase will be available in late October 1995.

Paragraph III

As the responsible party, you are responsible to pursue whatever actions are necessary to minimize any imminent impacts or threats to human health or safety and to stabilize the conditions caused by this release. Should any emergency abatement actions become necessary as a result of this release incident, you must notify the local TNRCC Regional Office immediately. Also, it should be noted that you are liable for third-party losses which may result from this incident.

Response: The Air Force will comply as required.

Paragraph IV

If assessment activities reveal the presence of any phase-separated hydrocarbons (PSH), then you are required, pursuant to 30 TAC 334.79, to immediately implement a recovery program which effectively removes the PSH from all impacted monitor wells, the tankhold, the piping chase, etc., to the maximum extent practicable and to notify this Office immediately. Daily observations should be made and appropriate action pursued to ensure that all phase-separated product is continuously removed.

Response: The Air Force will comply with this requirement.

Paragraph V

Pursuant to 30 TAC Section 334.82 (b), if you determine that contamination from the release has migrated off-site, then you are required to notify the affected landowner(s). Please note that landowners may include state and local owners of right-of-way properties. Please provide documentation that the affected landowner(s) has/have been notified.

Response: Documentation will be provided as required.

Paragraph VI

268004

Submit any additional reports or work plans concerning this case to my attention. Copies of all correspondence with this office must be provided to our Region 4 Field Office in Duncanville to the attention of Mr. Tim Sewell. You are also required to notify Mr. Sewell at 214/298-6171 at least forty-eight (48) hours in advance of conducting any significant on-site investigation including the performance of groundwater monitoring activities. The LPST ID Number 104524 should be included on all correspondence.

Response: *The Air Force will comply with this requirement.*

Paragraph VII

Should you have any questions, please contact me at 512/239-2200. Your cooperation in this matter is appreciated.

Response: *Cooperation will be provided.*

John Hall, *Chairman*
Pam Reed, *Commissioner*
R. B. "Ralph" Marquez, *Commissioner*
Dan Pearson, *Executive Director*



268005

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 10, 1995

CERTIFIED MAIL

Mr. Ohlen Long, P.E.
Site Manger, AFBCA
Carswell Air Force Base
6550 White Settlement Road
Ft. Worth, Texas 76114-3520

Re: Subsurface Contamination at the Base Service Station, Building
1518, Carswell Air Force Base (AFB), Ft. Worth (Tarrant
County), Texas
(LPST ID No. 104524 - Priority 1.5)

Dear Mr. Long:

The Texas Natural Resource Conservation Commission (TNRCC) has carefully reviewed the Existing LPST Case Questionnaire for the above referenced facility submitted August 30, 1994 and prepared by the U.S. Army Corps of Engineers, Ft. Worth District. The questionnaire indicates that this site is considered as a priority 1.5 due to the threat it may pose to the West Fork of the Trinity River. A letter dated August 11, 1994, from Mr. Frank Grey of Carswell AFBCA to Ms. Liz Scaggs of TNRCC PST, indicated that an interim remediation system would be installed on the subject site in late fiscal year (FY) 1994 and a ground water monitoring program would be implemented with comprehensive site assessment activities in FY 1995. Based upon the information provided to this Office at this time and recent communications with Mr. Frank Grey of AFBCA, the proposed corrective action activities have yet to implemented. Please understand that the TNRCC considers the subject site as a high priority case due to the historical release of petroleum hydrocarbons to the West Fork of the Trinity River.

The TNRCC is responsible for protecting waters of the state as well as public health and safety from contamination that may result when a release occurs from a storage tank system. Title 30, Texas Administrative Code (TAC), Section 334.71-334.85 requires the owner

or operator of a storage tank system to immediately abate any release of a regulated substance and to conduct an investigation for soil and groundwater cleanup. A ground water monitoring program using the guidelines in the enclosed pamphlet titled *Groundwater Monitoring and Reporting* and interim remediation should be implemented immediately. An interim remediation plan must be submitted to this Office no later than 60 days from the date of this letter and the first ground water monitoring report must be submitted no later than 90 days from the date of this letter.

As the responsible party, you are responsible to pursue whatever actions are necessary to minimize any imminent impacts or threats to human health and safety and to stabilize the conditions caused by this release. Should any emergency abatement actions become necessary as a result of this release incident, you must notify the local TNRCC Regional Office immediately. Also, it should be noted that you are liable for any third-party losses which may result from this release incident.

If assessment activities reveal the presence of any phase-separated hydrocarbons (PSH), then you are required, pursuant to 30 TAC §334.79, to immediately implement a recovery program which effectively removes the PSH from all impacted monitor wells, the tankhold, the piping chase, etc., to the maximum extent practicable and to notify this Office immediately. Daily observations should be made and appropriate action pursued to ensure that all phase-separated product is continuously removed.

Pursuant to 30 TAC Section 334.82 (b), if you determine that contamination from the release has migrated off-site, then you are required to notify the affected landowner(s). Please note that landowners may include state and local owners of right-of-way properties. **Please provide documentation that the affected landowner(s) has/have been notified.**

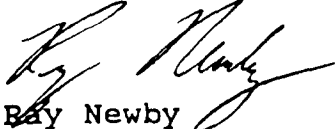
Submit any additional reports or work plans concerning this case to my attention. Copies of all correspondence with this Office must be provided to our Region 4 Field Office in Duncanville to the attention of Mr. Tim Sewell. You are also required to notify Mr. Sewell at 214/298-6171 at least forty-eight (48) hours in advance of conducting any significant on-site investigation including the performance of groundwater monitoring activities. **The LPST ID Number 104524 should be included on all correspondence.**

Mr. Ohlen Long, P.E.
Page 3

268007

Should you have any questions, please contact me at 512/239-2200.
Your cooperation in this matter is appreciated.

Sincerely,



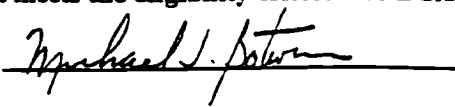
Ray Newby
Coordinator, Remediation Unit I
Responsible Party Remediation Section

ERN/ern
104525.cad

Enclosures

cc: Leigh Ing, TNRCC Office of Waste Management
Geof Meyer, TNRCC Industrial and Hazardous Waste Division
Tim Sewell, Region 4 Field Office, 214/298-6171,
(1019 N. Duncanville, Rd., Duncanville, Texas 75116-2201)

1. COMPONENT AFBCA		FY 1995 MILITARY CONSTRUCTION PROJECT DATA		2. DATE Revised 10 Aug 95	
3. INSTALLATION AND LOCATION AFBCA/OL-H Carswell AFB, TX 76127			4. PROJECT TITLE RD/RA Base Service Station (ST-16)		
5. PROGRAM ELEMENT BCA Budget Program 700		6. CATEGORY CODE N/A	7. PROJECT NUMBER DDPF 94-7206		8. PROJECT COST (\$000) \$3505.0
9. COST ESTIMATES					
ITEM		U/M	QUANTITY	UNIT COST	COST (\$000)
Phase I Remedial Investigation (New Wells) Remedial Investigation					100.0 139.0
Phase II Risk Assessment					236.0
Phase III Remedial Design					80.0
Phase IV Remedial Action Part 1 Remedial Action Part 2					1325.0 1405.0
Phase V Long Term Monitoring					220.0
TOTAL PROJECT COST					3505.0
10. DESCRIPTION OF PROPOSED CONSTRUCTION					
<p>Project includes all labor, material, equipment, transportation, and support for the remedial design, risk assessment, remedial action and site inspection of site ST-16, Base Service Station. Work includes extraction wells, biodegradation, groundwater remediation, risk assessment and a decision document/technical report.</p> <p>PROJECT: Perform interim remediation on an off-base river embankment through the use of three groundwater extraction wells and associated treatment equipment. Additionally, a risk assessment will be performed on the site. If action is determined necessary the remedial design and action will accomplish remediation through the use of biodegradation technology. The remedial design contractor will prepare the decision document and provide Title II inspection service. Project will also include a remedial investigation of the old military gas station (Bldg 1256-1263), which may be contributing to the BSS plume.</p> <p>REQUIREMENT: (CERFA), Comprehensive Environmental Response Compensation Liability Act (CERCLA), Clean Water Act, Texas Risk Reduction Rules.</p> <p>CURRENT SITUATION: In May 1992, the base reported a petroleum release into the west fork of the Trinity River. The release point is from the river bed which is located approximately 100 yards from the base boundary on this site. In October 1992 the first step of the Notice of Violation (NOV) process was started by the Texas Water Commission. A full Remedial Investigation/Feasibility Study (RI/FS) which includes the off-base river embankment is being conducted to determine if the source of the river release is this site. The RI/FS will be completed in April 1994. Base Service Station UST's were removed in Spring 1993.</p>					

1. COMPONENT AFBCA	FY 1995 MILITARY CONSTRUCTION PROJECT DATA	2. DATE Revised 10 Aug 95
3. INSTALLATION AND LOCATION AFBCA/OL-H Carswell AFB, TX 76127		268009
4. PROGRAM ELEMENT BCA Budget Program 700		5. PROJECT NUMBER DDPF 94-7206
<p>IMPACT IF NOT PROVIDED: The Texas Water Commission will issue an additional enforcement action possibly resulting in fines and penalties. Also, the Air Force will not be able to sell or transfer this property until it can meet the requirements of CERCLA section 120h and CERFA. Notice of Violation (NOV) is on the horizon for this one!</p> <p>ADDITIONAL Project Priority: LA Contracting Agent: AFCEE</p> <p>I have reviewed this requirement and certify that it meets the eligibility criteria for BCA funds</p> <p></p>		

P 555 228 287

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1989-234-555	Sent to	Ray Newby
	Street and No.	12118 Park 35 Circle
	P.O. State and ZIP Code	Bldg D. ex P.O. Box 13087 Austin, TX 78753
	Postage	
	Certified Fee	1.00
	Special Delivery Fee	1.00
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	1.00
	Return Receipt showing to whom Date, and Address of Delivery	
	TOTAL Postage and Fees	\$ 3.00
PS Form 3800, June 1985	Postmark or Date	JUN 19 1995 USPS NORTH DALLAS

268010
P 555 228 284

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1989-234-555	Sent to	Geoff Meyer
	Street and No.	12118 Park Circle
	P.O. State and ZIP Code	P.O. Box 13087 Austin TX 78753
	Postage	
	Certified Fee	1.00
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	1.00
	Return Receipt showing to whom Date, and Address of Delivery	
	TOTAL Postage and Fees	\$ 3.24
PS Form 3800, June 1985	Postmark or Date	JUN 19 1995 USPS NORTH DALLAS

P 555 228 286

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1989-234-555	Sent to	Geoff Meyer
	Street and No.	12118 Park 35 Circle
	P.O. State and ZIP Code	Austin, TX 78753
	Postage	1.78
	Certified Fee	1.00
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	1.00
	Return Receipt showing to whom Date, and Address of Delivery	
	TOTAL Postage and Fees	\$ 2.78
PS Form 3800, June 1985	Postmark or Date	JUN 19 1995 USPS NORTH DALLAS

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